

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2015-35-T

IN RE: Application of Simmons)
Moving, LLC d/b/a College Hunks) **APPLICANT'S MOTION FOR SHIPPER**
Moving for a Class E (Household) **WITNESS TESTIMONY BY AFFIDAVIT**
Goods) Certificate of Public)
Convenience and Necessity for)
Operation of Motor Vehicle Carrier)

NOW MOVES the Applicant, Simmons Moving, LLC, hereby requesting this Commission accept the Sworn Affidavit of the Shipper Witness in lieu of his direct testimony before the Commission on May 3rd, 2017 based on the following:

1. The Shipper Witness is a resident of Spartanburg, South Carolina and the President of Dearbury Oil Company.
2. The Applicant submitted a signed and notarized affidavit summarizing the testimony of the Witness as gathered in a conference call.
3. Counsel for ORS participated in the conference call used in gathering the Witnesses' testimony by affidavit.
4. The Witness is an executive with a demanding and unpredictable schedule.
5. Appearing before this Commission, in person, on May 3rd, 2017 will present difficulties and a hardship for the Witness and his company.
6. Accepting this sworn affidavit as direct testimony will not prejudice the Commission or ORS.

BASED ON THE FOREGOING, the Applicant respectfully moves for the relief requested.

I so move!



Chase Austin Elliott, Esq.
Counsel for the Applicant

Charleston, South Carolina
April 26, 2017